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July 27, 2023

Via ECF

Hon. John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
500 Pearly Street
New York, NY 10007

RE: *Miguel Santiago v. Umbrella Management LLC, et al.*
Case No. 23-cv-02673 (JGK)(SLC)

Dear Judge Koeltl,

We are counsel for Plaintiff and write, jointly with counsel for Corporate Defendant Umbrella Management LLC, to respectfully request an adjournment of the Initial Conference currently scheduled for August 3, 2023, at 2:30 p.m.

Plaintiff filed his First Amended Complaint today, on July 27, 2023. Corporate Defendant Umbrella Management LLC's response to the original complaint is due August 28, 2023, per Court Order. Given the filing of the amended complaint, counsel for Corporate Defendant Umbrella Management LLC has requested an additional two (2) weeks, until September 11, 2023, to file a response to Plaintiff's First Amended Complaint.

Therefore, the parties write to respectfully request an adjournment of the Initial Conference from August 3, 2023 until at least September 25, 2023, so that the parties may file the Court's initial conference submissions a week prior to any scheduled initial conference. This is the first request for an adjournment of this conference.

Individual Defendants Parmod Chadha and Harsh Seth have yet to be served and the deadline to serve them have not expired.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Clara Lam

Clara Lam, Esq. (CL6399)

cc: Corporate Defendant Umbrella Management LLC via ECF
Parmod Chadha and Harsh Seth via First Class Mail

*1. Response to the Complaint
due 9/11/23.
2. Conference adjourned to
9/25/23 at 4:30 P.M.
So ordered.
JGK/Koeltl
7/27/23 U.S.D.J.*